

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

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SPERO HARITATOS, an Individual,

Plaintiff,

v.

**MANDATORY DISCLOSURE**

05-CV- 930 (DNH/GJD)

HASBRO, INC., a Rhode Island corporation and  
TOYS "R" US-NY LLC, a New York limited  
liability corporation,

Defendants.

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**SIRS:**

**PLEASE TAKE NOTICE** that pursuant to Fed. R. Civ. P. 26(a), defendant, Toys "R"

US-NY LLC, states as follows:

1. Individuals known or believed to have information with respect to claims  
and defenses:

(a) Michael Tabakin, employed by Toys "R" Us.

(b) Greg Staley, Warren Kornblum, Joel Anderson, Elliot Wahls, each of  
whom was formerly employed by Toys "R" Us.

2. Accompanying this initial disclosure are documents from Toys "R" Us files. In addition, be advised that there are written communications which are sent by or to Toys "R" Us's attorneys, of which privilege is claimed.

3. No expert witness has been retained by Toys "R" Us as of this date.

Dated: December 14, 2005



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